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EPA Region 5 Records Ctr.



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**VIA FEDERAL EXPRESS**

(and via Electronic Mail )

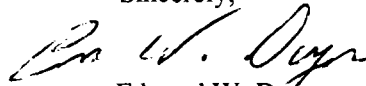
Brian Barwick, Esq.  
Assistant Regional Counsel  
United States Environmental Protection Agency  
Region 5  
C-14J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-2402

RE: The Hartford Area Hydrocarbon Plume Site (Response to Comments of the Public  
and USEPA on Administrative Order on Consent)  
Our File No. - PREM:006

Dear Brian:

Enclosed please find the Comments of The Premcor Refining Group Inc. responding to Comments of the Public and those of the United States Environmental Protection Agency regarding the Administrative Order on Consent for the Hartford Area Hydrocarbon Plume Site ("AOC"). Consistent with paragraph 110 of the AOC, please ensure that the Comments are included in the public record. Thank you in advance for your assistance in this matter. If you have any questions, please feel free to contact me at the address and telephone number above.

Sincerely,



Edward W. Dwyer

EWD:cmw  
enclosure

pc: James L. Morgan, Esq., Illinois Attorney General's Office (via electronic mail; w/enclosure)  
Mike Roubitchek, Esq., Illinois EPA (via electronic mail; w/enclosure)  
Christina L. Archer, Esq., Shell Oil Company (via electronic mail; w/enclosure)  
Joel Hubscher, Esq., Shell Oil Company (via electronic mail; w/enclosure)  
Ronald J. Ganim, Esq., BP America Inc. (via electronic mail; w/enclosure)  
Jeffrey Dill, Esq., Premcor Refining Group Inc. (via electronic mail; w/enclosure)  
James F. Bennett, Esq., Bryan Cave LLP (via electronic mail; w/enclosure)

PREM:006/Corr/Barwick01 Ltr - Premcor Comments to USEPA & Public Comments

## **COMMENTS TO USEPA RESPONSE BY THE PREMCOR REFINING GROUP INC.**

Atlantic Richfield Company, Equilon Enterprises, LLC, and The Premcor Refining Group Inc. (collectively "the Hartford Working Group," hereinafter "HWG") have entered into an Administrative Order on Consent ("AOC") with the U.S. Environmental Protection Agency ("U.S. EPA"). The AOC requires HWG to investigate hydrocarbon contamination below portions of Hartford, Illinois. U.S. EPA already provided responses to public comments on the AOC and the HWG generally concurs with U.S. EPA's comments. The Premcor Refining Group Inc. ("Premcor") provides the following additional comments to clarify a few issues.

In response to a public comment that the vapor extraction system installed in the early 1990's failed, the U.S. EPA responded that: a "lack of maintenance on the system significantly reduced its effectiveness. It also appears that the original design may not have been adequate to clean up the entire contaminated area." Premcor believes those characterizations do not adequately describe the reasons for the reduced effectiveness of the system over time, nor accurately represent the history of the system.

The system is continuing to remove vapors, although as would be expected with any system, not as effectively as when it was new. The system was "state of the art" at the time it was installed, and was designed based on the hydrogeologic and geologic information known at the time. Through recent efforts by the HWG, all interested parties now know a great deal more about the hydrogeology and geology in Hartford than we did in 1990. We have also learned from the experience with this system, combined with our better understanding of hydrogeologic and geologic conditions, how to design a more effective system that should minimize the loss of efficiency over time. Furthermore, the new design will allow for the rehabilitation of the new vapor control borings, should that become necessary.

Next, to state that the system may not have been adequate to clean up the entire contaminated area implies that the system was originally designed to do so. That is not the case. The system was designed in the early 1990's, to address conditions in a geographic area, smaller than the area of concern in Hartford today.

As to the alleged "lack of maintenance," the system has been maintained. The blowers and thermal treatment unit have been repaired, overhauled and replaced when necessary. It is the below ground components of the wells in the system that have lost efficiency. Being below ground, and not readily accessible, by design and necessity, it has been difficult to evaluate and ultimately determine until recently that reduced efficiency resulted from plugging of the bottom of the wells, 20 or 30 feet below ground surface.

The plugging, however, was less a result of lack of maintenance than due to the original well design and the conditions encountered over time. With the benefit of hindsight, we now know that the well screens' design was not compatible with the groundwater conditions encountered over the life of the system. The high groundwater conditions created by the extraordinary 1993 and 1995 floods, for instance, may have been a factor. New vapor extraction wells are being installed in the near future, based upon the better and more comprehensive information gathered by HWG and U.S. EPA in the course of work being conducted under the AOC.

In response to the comment that residents should be relocated while the remedial project is accomplished, Premcor notes that the Illinois Department of Public Health in its report and recommendations did not advise that mass relocation was warranted. However, as pointed out by the U.S. EPA in its: Response To Comments For The Hartford Area Hydrocarbon Plume Site, ("USEPA Response") emergency temporary relocation will be provided if conditions in particular homes call for it. Finally, as also stated in the U.S. EPA Response, the interim measures of the AOC "will protect residents while an expedited but comprehensive investigation is conducted and until the final remedy is designed, implemented and effective."

PREM:006/Misc/Comments to USEPA response